

Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

OF COUNSEL:

RICHARD L. WHITT

JEFFERSON D. GRIFFITH, III

401 WESTERN LANE, SUITE E,
IRMO, SOUTH CAROLINA 29063
MAILING ADDRESS: POST OFFICE BOX 362
IRMO, SOUTH CAROLINA 29063
TELEPHONE: (803) 995-7719

May 24, 2021

VIA, ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina

Re: • Docket 2019-226-E
 • South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to
 S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion
 Energy South Carolina, Incorporated

Ms. Boyd:

This correspondence is filed on behalf of the Carolinas Clean Energy Business Association ("CCEBA") **and this filing supersedes the earlier filing on this same subject.** Please make the Commissioners aware of this correspondence. Please reference the correspondence filed by Dominion Energy South Carolina, Incorporated ("DESC") today - responding to comments submitted by Intervenors over a month ago - which should be disregarded as untimely. At a minimum, this Commission should not let DESC's correspondence confuse a central issue before this Commission.

That issue is whether the newly identified preferred plan in the Modified IRP (RP8) should be modeled with the addition of near-term solar and storage, given that near-term solar and storage were shown in the Modified IRP to provide significant cost savings over DESC's original preferred plan, RP2.

DESC's correspondence does not contend that modeling near-term solar/storage for RP8 is infeasible. Nor does the correspondence directly deny that such modeling could reveal cost savings for ratepayers. Instead, DESC tries to distract this Commission with a different claim: that near-term solar/storage additions cost more than other solar portfolios.

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Even if that claim were true¹, it is irrelevant to the issue before this Commission. The issue before this Commission, is whether near-term solar/storage with RP8 would be cheaper for ratepayers. Modeling runs could and should answer the question, and DESC can and should be directed to quickly undertake that modeling.

Respectfully Submitted,

/s/Richard L. Whitt,
Richard L. Whitt,
*As Counsel to the Carolinas Clean Energy Business
Association.*

cc: All parties of record in Docket 2019-226-E, *via electronic mail*

¹ Contrary to DESC's claims, the Modified IRP shows the near-term addition scenario (RP7b3) as less expensive compared to 2026 deployments (RP7) in the \$35/ton scenario, and within .1% of RP7 in all other scenarios – i.e., virtually identical. See Modified IRP, p. 57.